

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF MICHIGAN**FILED - GR**November 20, 2024 11:06 AM
CLERK OF COURT
U.S. DISTRICT COURT
WESTERN DISTRICT OF MICHIGAN
BY: KB SCANNED BY: KB 11/20Nathan Joiner Jr. Jail ID # 111702 Prison ID 594446

(Enter above the full name of the plaintiff(s), including prisoner number, in this action. If you cannot list all plaintiffs in the space provided, please write "see attached" and list all names on an additional page.)

v.

Steven A. Freeman (P45725) Assistant Public DefenderAdam Pfeiffer (P8425) Assistant Prosecuting AttorneySincere DunbarAlicia Roncal (RONCAL)Ingham County Court/Magistrate/Judge/30th Circuit Court

(Enter above the full name of the defendant(s) in this action. If you cannot list all defendants in the space provided, please write "see attached" and list all names on an additional page.)

1:24-cv-1238
Jane M. Beckering
U.S. District Judge**COMPLAINT**
(Print Clearly)**I. Previous Lawsuits**

CAUTION: The Prison Litigation Reform Act has resulted in substantial changes in the ability of incarcerated individuals to initiate lawsuits in federal courts without prepayment of the civil action filing fee. Accurate and complete responses are required concerning your litigation history. Generally, a plaintiff's failure to accurately and completely answer the questions set forth below will result in denial of the privilege of proceeding *in forma pauperis* and require you to pay the entire \$405.00 filing fee regardless of whether your complaint is dismissed.

- A. Have you ever filed a lawsuit while incarcerated or detained in any prison or jail facility? Yes ☐ No ☒
- B. If your answer to question A was yes, for each lawsuit you have filed you must answer questions 1 through 5 below. Attach additional sheets as necessary to answer questions 1 through 5 below with regard to each lawsuit.
1. Identify the court in which the lawsuit was filed. If it was a state court, identify the county in which the suit was filed. If the lawsuit was filed in federal court, identify the district within which the lawsuit was filed.

 2. Is the action still pending? Yes ☐ No ☐
a. If your answer was no, state precisely how the action was resolved: _____

 3. Did you appeal the decision? Yes ☐ No ☐
 4. Is the appeal still pending? Yes ☐ No ☐
a. If not pending, what was the decision on appeal? _____

 5. Was the previous lawsuit based upon the same or similar facts asserted in this lawsuit? Yes ☐ No ☐
a. If so, explain: _____

II. Parties

A. Plaintiff(s)

Enter your name, place of confinement, address, and place of confinement during the events described in the complaint in the blanks below. Provide the same information for any additional plaintiffs. Attach extra sheets as necessary.

Name of Plaintiff Nathan Joiner Jr.

Place of Present Confinement Ingham County Jail

Address 640 N. Cedar St. ~~East~~ Masonmi 48854

Place of Confinement During Events Described in Complaint Ingham County Jail

B. Defendant(s)

Complete the information requested below for each defendant in this action, including whether you are suing each defendant in an official and/or personal capacity. Provide the same information for each additional defendant. If there are more than six defendants attach extra sheets as necessary.

Name of Defendant #1 Steven A. Freeman (P45125)

Position or Title Ingham County Public Defender (Assistant Public Defender)

Place of Employment Office of The Public Defenders

Address 320 N. Washington Sq., Ste 100 Lansing, MI 48933

Official and/or personal capacity? _____

Name of Defendant #2 Adam Pfeiffer (P8425)

Position or Title Assistant Prosecuting Attorney

Place of Employment Ingham County Prosecuting Attorney Office

Address 303 W. Kalamazoo Street, 4th Floor Lansing, MI 48933

Official and/or personal capacity? _____

Name of Defendant #3 Sincere Dunbar

Position or Title Ex-girlfriend

Place of Employment unknown

Address 900 Long Blvd unit #286 Lansing, MI 48911

Official and/or personal capacity? _____

Name of Defendant #4 Alicia Ronceal

Position or Title Ex-girlfriend's "new friend"

Place of Employment Detroit Wing Company, "Lansing"

Address unknown

Official and/or personal capacity? _____

Name of Defendant #5 Ingham County Court/Magistrate

Position or Title Magistrate/Judge "For Bond hearings"

Place of Employment Ingham County District Court / 30th Circuit Court

Address ~~124~~ 124 W. Michigan Ave. Lansing, MI 48933

Official and/or personal capacity? _____

III. Statement of Claim

State here the **facts** of your case. Describe how each defendant is personally involved. Include also the names of other persons involved, dates and places. **Do not give any legal arguments or cite any cases or statutes.** If you intend to allege a number of related claims, number and set forth each claim in a separate paragraph. **Do not include unrelated claims.** Use as much space as you need. Attach extra sheets if necessary.

Due to Adam Pfeiffer's maliciousness, Steven A. Freeman's ineffective assistance of counsel, and both Sincere Dunbar & Alicia Roncal's false perjured testimonies, I have been forced into having a Mistrial, where I have been found guilty by a jury of 13 criminal charges. After reviewing my case's Transcripts, and attached forms. It can be viewed that in plain sight that my Constitutional and civil rights has been violated. On Jan. 14th 2024 at my home where me and my girlfriend lived together. I was arrested and taken to jail, because false police reports were made against me. I was charged with Home invasion 1st degree and Violation of a PPO. My girlfriend Sincere Dunbar lied to police officer's stating that I did not live at our residence. Alicia Roncal stated to the police that I assaulted her. I was arraigned and was given an Outrageous & Punitive Bond for the amounts of \$50,000.00 (cash only) for the PPO violation, and \$100,000.00 (Cash/Surety) for the home invasion. I was already qualified for Court Appointed Counsel indicating that I was indigent. My Preliminary Examination was Set for Feb. 1st 2024 in front of Judge Simmons at 54th District Court. Prior to my prelim, Mr. Freeman came to the jail to visit me. Mr. Freeman had informed me that Sincere has contacted the prosecuting Attorney's by phone & in person, that she didn't want to pursue with pressing charges and that she will not be coming to testify against me. Mr. Freeman also informed me that Ms. Dunbar had sent him a rent receipt showing that I pay the rent out of my savings Account per Cashier's check. Mr. Freeman told me that he and Ms. Dunbar had made arrangements for her to give the original to him, so that he can make copies. Mr. Freeman informed me that despite of what Ms. Dunbar has recanted, they want to pursue with charges anyway. They meaning the prosecutor.

NOTE: I was never Served a PPO... I have
not been heard for any PPO Violation.

see attachments for more...
Total of 5 Attachments →

Statement of Claim

Attachment #1

On Feb. 1st, 2024 my Prelim was held, and on my behalf Ms. Dunbar arrived. She had given Mr. Freeman the rent receipt. Not only did Ms. Dunbar give him the receipt, she also had given Mr. Freeman a handwritten letter by her. Stating in the letter that she was Drunk and upset with me, which is why she made false reports on me. She also stated in her letter that, she does not want to pursue with pressing charges on me, and that I do live at our address. Mr. Freeman made copies of the documents that was given to him by Ms. Dunbar, but he did not present the evidence to the courts. Ms. Dunbar left the courthouse. I asked Mr. Freeman to present the evidence to the courts. He refused. During the prelim the Judge asked Mr. Pfeiffer to call his witness ^(Ms. Dunbar) to the stand. Mr. Pfeiffer walked out of the courtroom and returned, and stated "she was here to testify, but she left because of an emergency." I stood up asked to address the court to inform the court that yes, Ms. Dunbar was there, but only on my behalf to bring forth evidence to help me. The Judge shouted at me repeatedly asking me how did I know what I knew? I told her that my attorney, Mr. Freeman had let me know. Mr. Pfeiffer stated that he was unaware of any recantments from Ms. Dunbar, he said that he didn't get the memo, and that she must've told a different prosecutor. Mr. Pfeiffer then charged me with contempt of court, because Sincere had video visited me while I was in jail.

{ I have copies of the recantment letter
and of the rent receipt. Tagged as... }

Exhibit A and Exhibit B

Turn over →

I asked Mr. Freeman to file a motion for dismissal due to the evidence, recantments, and no witness. He did not file the motion. Mr. Pfeiffer then charged me for a "Operating without a license" that I had previously been tried for and was dismissed. My case was adjourned until March 1st, 2024. At my second preliminary exam I entered the courtroom. Mr. Freeman whispered to me very loudly saying "She's not here" referring to Ms. Dunbar. I asked Mr. Freeman to present the evidence that he obtained, and to file a motion for dismissal. He didn't present the evidence nor did he file for dismissal. I was then informed by Mr. Freeman that Mr. Pfeiffer would be calling the police officer as a witness, I asked Mr. Freeman to object to any and all of the officer's "Hearsay" Testimonial statements. Mr. Freeman did not object. Mr. Freeman told me to "shush-up" talking to him. Mr. Freeman asked the judge to have me seated away from him. The judge made me move to another seat away from him. Mr. Freeman made a gesture patting Mr. Pfeiffer on the back stating that Mr. Pfeiffer is his "Friend's Colleague". I addressed the court stating that I did not want to be represented by Mr. Freeman anymore. The judge told me to be quiet and to sit down. She informed me stating that "They all are colleagues". My case was again adjourned. At my 3rd preliminary exam, I asked Mr. Freeman to file for Dismissal and to present evidence. He refused! Mr. Freeman informed me that more charges were being brought up against me per Adam Pfeiffer. Charges that were previously made up, →

Statement of Claim

Attachment #2

by Simere Dunbar. He informed me stating that, if I did not waive my preliminary exam, The prosecutor said that he's going to add a "witness Tampering" charge to my new and already charges. I did not waive my rights. Throughout my duration of stay at the jail, Upon information and belief. Ms. Dunbar did not want me in jail, She had been afraid to come forward to any court appearances for fear of being prosecuted herself (For filing Fake police Reports) She last stated that, "She washing her hands with the whole situation", and she has done all that she could do. Ms. Dunbar has continuously deposited money into my Account, paid for messaging credits for us to communicate "via kiosk" She has sent me any number of thoughtful photos of herself and her son, completed with notes of encouragement and hope for the future. I asked Mr. Freeman yet again to present the Documentation that he'd obtained from Ms. Dunbar he did not. At my 4th preliminary exam in front of Judge Simmons I was informed of the 12 charges "new charges" that was being brought against me by Adam Pfeiffer. For two separate cases, where I was given two more Punitive bonds of the amounts of \$75,000.00 cash/surety and \$20,000.00 cash/surety which totaled up to \$240,000.00 all together. I expressed to Mr. Freeman that he needed to come down to the jail to speak to me about my cases. Mr. Freeman replied stating "You'll get six minutes before trial to talk to me". That was on April 11th, 2024.

Turn over,

On April, 11th 2024 a court order was signed per magistrate Faulkner to take away my visits, phone calls, messages. I believe that order was requested by Adam Pfeiffer, because I never been before such Magistrate. My case was bonded over to 30th circuit court Judge Jarno, but was switched to Judge Draganchuk. July 1st, 2024 was my scheduled date for Pretrial conference. The Pretrial conference was never held. I was taken down to the court building, but I never stepped inside the courtroom. Mr. Freeman didn't show up! I didn't hear a word from Mr. Freeman from April, 11th 2024, until August 21st, 2024. By this time I had sent out letters, letters to the judge and to the Public defenders office requesting for new counsel. On August 21, 2024 My Bond hearing was held, Mr. Freeman came down to the courtroom lock-up to speak to me. He explained to me that the prosecutor was offering a "year" if I Plead to the Domestic Violence charge. I told Mr. Freeman "Yes" I will take the plea. By this time I had been in jail for 8 months. I asked Mr. Freeman about dismissal due to my Speedy trial 180 day rule? Mr. Freeman told me that the 180 day rule did not apply, because of the pandemic. At my bond hearing, Mr. Pfeiffer stated to the court that I denied the plea offer. Mr. Pfeiffer also stated to the court that my Uncle's house would not be a good candidate to live at because my Uncle would allow me to have contact with my accuser. Mr. Pfeiffer stated to the court that I "Hospitalized another inmate while in jail. Those were →

Statement of claim

Attachment #3

all false statements. Another inmates information was "accidentally" added to my Bond Risk Assessment Report, where the other inmate had a "no bond hold". Due to all of the false information that the judge had been given, she denied my bond and did not reduce it. I asked Mr. Freeman why didn't he object to all of the false info given by Mr. Pfeiffer? I also asked Mr. Freeman why didn't he mention to the courts that I was willing to accept the plea offer? Mr. Freeman "Shushed me" and replied saying that Mr. Pfeiffer was allowed to speak. Mr. Freeman said that he was going to come back down to the courtroom lock-up to speak with me. He never came to speak to me. I called Mr. Freeman's phone, left voicemails, left emails. Mr. Freeman never responded to any of them. I wrote the Judge and the Public Defender's office again asking to remove Mr. Freeman off of my case due to his negligent attitude and ineffectiveness. In the letters I also mentioned my rights to due process, and I informed the courts about Mr. Pfeiffer's false statements and allegations. I never received any response from any of the letters that I had sent out. On Sept 16th, 2024 Mr. Freeman came to the jail to speak to me in regards to the letters that I wrote. He explained to me that the judge does not read any letters that are sent to her by inmates. He agreed that most of what I stated in the letters were true. Mr. Freeman told me that the judge will not remove him off of my case, and that would have to be a motion that he →

himself would have to file. Mr. Freeman stated that he will not remove himself from my case. Mr. Freeman manipulated me by saying my case will be getting dismissed, and that I had been scheduled for trial the following month. Mr. Freeman told me that I would be pleased by a motion that he had prepared. He didn't show me, because he said he left it in his car by mistake. I asked Mr. Freeman if there should be a "Pretrial" or "Final Pretrial" before trial? He answered no! Mr. Freeman never discussed any defense plan with me for trial. He never discussed how much time I could be facing if I were to lose at trial. Mr. Freeman never mentioned any plea offer that day. He said that he would be back to visit me within the next couple of weeks. He asked me if I had any knowledge of Ms. Dunbar's whereabouts. I told him no I did not. He then stated "Good They don't know either," referring to "they" as in the prosecutors. Mr. Freeman stated that my case was going to be dismissed either with or without prejudice. He told me that my jury trial date was set for... Oct 14th, 2024. His exact words were, By October 15th, 2024 I would be getting out of jail. Before he excused himself, he advised me to not talk to anyone about our visit. I asked Mr. Freeman why didn't he object to me having one trial for 3 separate cases? He didn't explain. On Oct. 7th, 2024 Mr. Freeman came to the jail to speak to me about trial. He stated that on Monday Oct 14th, 2024 we will be doing a Jury Selection. He told me that on Tuesday Oct. 15th, 2024 I would be released from jail. →

Statement of Claim

Attachment #4

During Jury Selection I was instructed by Mr. Freeman that I would only be allowed to remove 5 Jurors. I only removed 4. Mr. Pfeiffer removed every African American except one African American Female. The remaining Jurors were all Caucasian Females 3 males. All of the female Jurors were at least the age of 50 years or more. None were my peers. Mr. Pfeiffer referred to me as a "abuser" to the jury a dozen of times. Mr. Freeman never objected. Mr. Pfeiffer made demonstrations to the jury using a "chokehold" with his arms Making statements saying that is how I attacked my Accuser. Mr. Freeman never objected. My accuser never once stated that I put her in any chokehold. Mr. Pfeiffer repeatedly narrated acts of violence to the jury, and Mr. Freeman let him without any objections. During my testimony Mr. Freeman would ask me a question, and while I tried answering he would cut me off in mid sentence not allowing me to give my side of the story. During my testimony while getting cross-examined by Adam Pfeiffer he would ask me multiple questions at once and try to force me to give him a yes or no! He kept yelling at me, shouting at me, I asked him could he stop yelling at me? Mr. Pfeiffer replied "I can talk to you however I want to Mr. Freeman did not object. I was under Duress and very intimidated. Mr. Pfeiffer made remarks asking me did I have amnesia because due to his yelling I couldn't answer his questions. After my direct exam with Mr. Freeman, He walked over to Mr. Pfeiffer and stated that "he's an expert at direct exam", and that he appreciated Mr. Pfeiffer for not standing to object for several reasons. Since April 11th, 2024 I have not been able to communicate

turnover →

or have any contact with my kids, family, loved ones, or anyone on the outside of jail. Adam Pfeiffer has personally called to the jail abusing his power and authority, to have me locked down in Solitude. During the duration of my trial Adam Pfeiffer had called to the jail to make them lock me down for 23 hours a day. After my trial was over the jail placed me back into "General Population". The Sgt. Holmes made it to where I was only allowed to call one emergency contact, which is my Uncle, and to where I could call my attorney. On Oct. 31st, 2024 Adam Pfeiffer personally called the jail again to have me moved out of "General Population" and to be placed back into 23 hour Solitaire confinement. I was informed by the jail's staff that per Judge Draganchuk and per prosecutor Adam Pfeiffer that I will have to be placed in Solitude until I go to prison! I can no longer contact either my Uncle or my Attorney at all. My next court date is on Dec. 10th, 2024 in front of Judge Draganchuk, where I will be getting sentenced for the 13 charges I have been convicted of. I hope and pray that by me filing this claim some action will be taken beforehand. There are other inmates with similar or worst cases than mine, they are still communicating/contacting their accusers via phone, message, video visits. Mr. Pfeiffer has not pressed the issue with any of those inmates regarding their communication. I know that I have been targeted and selectively prosecuted by Adam Pfeiffer.

Statement of Claim

Attachment #5

Monday, Oct. 14th, 2024 While sitting in the courtroom lock-up, Mr. Freeman came to speak with me. He came to let me know that Sincere Dunbar has showed up and was going to testify against me. He showed me a list of felony charges, and said that was what the prosecutor was offering. He didn't advise me to take the offer, and I did not want to. During Sincere's testimony, she started off saying that she did not remember things. Mr. Pfeiffer handed her a copy of the police report for her to recite, "coercing" her. Mr. Freeman Did not object. Both Alicia and Sincere's Testimony's were inconsistent. I asked Mr. Freeman to ~~Impeach~~ ^{Impeach} the Both of them due to their lies and inconsistencies. Mr. Freeman told me, that was something that I would have to do, myself. Ms. Dunbar and Ms. Rancal gave perjured testimonies at trial. The Judge explained to the jury that they can look at all the evidence for elaboration. The letter or the rent receipt was not presented to them. I asked the judge why didn't Exhibit A and Exhibit B get presented to them. The judge stated that they will not be presented. I asked Mr. Freeman why didn't he present the evidence? He replied "It's over... we're done". On my last day of Trial, before reading me my Verdict Judge Draganchuk and Adam Pfeiffer were continuously smiling at each other. This whole situation has been one big nightmare to me. I am very Mentally Depressed, and under a lot of ~~stress~~ ^{Duress}. I feel as if my life is being Robbed from me. There has been a lot of Foul Play that has been conducted between the two. Steven A. Freeman and Adam Pfeiffer →

in regards to me and my case. My Transcripts and other evidence will reveal concrete proof of my claims.

Side Note: At trial I asked Mr. Freeman to present Exhibit A & B to the jury. He refused. I asked the Judge why didn't Exhibit A or B get presented? She never minded me. During Mr. Freeman's Closing Argument He addressed the prosecutor Adam Pfeffer as "his friend" to rub it in my face. I asked Mr. Freeman to subpoena the photos and messages that was sent to me by Ms. Dunbar. Mr. Freeman Stated that "We're not going after her" I explained that I needed those photos as evidence on my behalf for my defense.

★ It is to my understanding that there is a deadline that is required to be met in regards to filing an Appeal! I was convicted on Friday October 18th, 2024. Today is Friday November 15th, 2024. I have not heard or spoken to My Attorney Steven A. Freeman Since the day I was convicted. Mr. Freeman has not given me any instructions or Counsellations for filing my appeal. I'm afraid that Mr. Freeman is purposely not wanting me to meet my appeal Deadlines.

★ My case numbers that are associated with my claim are:
24-000325-FH
24-000326-FH
24-000327-FH

★ I would like instructions on how to file my appeal Please!

IV. Relief

State briefly and precisely what you want the court to do for you.

Please See Attached Forms for further details...

V. Notice to Plaintiff Regarding Consent

In accordance with the provisions of 28 U.S.C. § 636(c) and Federal Rule of Civil Procedure 73, you are hereby notified that the United States magistrate judges of this district court may, upon your consent, conduct any or all proceedings in this case, including a jury trial and entry of a final judgment. If you consent, any appeal from a judgment entered by a magistrate judge shall be taken directly to the United States Court of Appeals for this judicial circuit in the same manner as an appeal from any other judgment of a district court.

Magistrate judges have greater flexibility in their schedules than district judges, who have heavy criminal caseloads that take priority over civil trials. Accordingly, the magistrate judges are generally able to schedule prisoner civil rights cases for jury trial much sooner, and they are able to provide firm trial dates. Magistrate judges are experienced trial judges who handle a great number of prisoner civil rights cases.


Your decision to consent to the dispositive jurisdiction of a United States magistrate is entirely voluntary. If you do not consent to a magistrate judge, the case will be randomly assigned to a district judge. The magistrate judge already assigned to this case would continue to decide all pretrial matters and would handle all dispositive motions by report and recommendation.

Please check **ONE** box below to indicate whether you voluntarily consent to proceed with a United States magistrate judge or if you would instead prefer that the case be assigned to a district judge.

☒ I hereby voluntarily consent to the United States magistrate judge conducting all proceedings in this case, including entry of a final judgment and all post-judgment matters.

☐ I request that this case be assigned to a district judge.

11-15-2024
Date


Signature of Plaintiff

NOTICE TO PLAINTIFF(S)

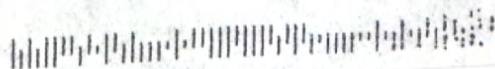
The failure of a *pro se* litigant to keep the court apprised of an address change may be considered cause for dismissal.

IV Relief

- 1.) For Steven A. Freeman #P45125 to be Disbarred From the law. For Him to be investigated and tried for all of his cruel, and Malicious foul Play that he has conducted. To me and to others who has suffered from his actions. For him to face jail time to the fullest extent.
- 2.) To be compensated for my lost of wages, my time, mental duress, physical pain, and emotional distress that I have endured since been in jail. I lost my car, my job, and Valuable time away from my kids and loved ones. I would like to be acquitted from all of the false charges that I've been convicted of due to ineffective Assistance of counsel, malicious prosecution, and inconsistent perjured testimonies. This whole situation has disturbed my Sanity. If not acquitted at the least granted a new fair trial!
- 3.) As For both Sincere Dunbar & Alicia Ronceal, I would like for them to be prosecuted and punished accordingly to their actions against me.
- 4.) Adam Pfeiffer #P8425 to be Disbarred from the law. For him to be investigated and tried. For him to be punished accordingly for the cruel and malicious Acts that he has taken part in regards to me and my case.
- 5.) For the judges and the courts, I'd like the justice that I'm entitled to as being a Law abiding citizen of the United States of America.



United States District Court
399 Federal Building
110 Michigan St. N.W.
Grand Rapids, Michigan 49503



Nathan Joiner Jr. # 111702
Ingham County Jail
640 N. Cedar St.
Mason, MI 48854